

EXHIBIT A

You are requested to designate one or more officers, directors or managing agents, or other persons who consent to testify on Your behalf who have knowledge of the matters set forth herein.

## TOPICS

1. Your agreement with Kerr assigning Kerr's claims to You.
2. Kerr's records concerning purchases, inventory, and/or returns, including the policies and procedures Kerr used to determine the quantities of fenofibrate products you purchased, including (1) TriCor®, (2) Lofibra®, (3) Antara®, (4) Triglide®, (5) Lipofen®, and (6) any proposed Impax product either developed or under development, including the data produced by You Bates labeled MEI 0001-141 and MEI 00157.
3. The process(es), method(s), strategies, and/or procedures Kerr proposed, considered, or used for setting or establishing the prices (whether direct or contract, and including rebates, discounts, and/or chargebacks) for any fenofibrate product, including (1) TriCor®, (2) Lofibra®, (3) Antara®, (4) Triglide®, (5) Lipofen®, and (6) any proposed Impax product either developed or under development.
4. Your ability to control or influence the type or amount of pharmaceutical products demanded by Your customers or prescribed for consumers, and the substitutability between any such products, including (1) TriCor®, (2) Lofibra®, (3) Antara®, and (4) Triglide®, (5) Lipofen®, (6) any proposed Impax product either developed or under development, (7) statins, and (8) any other cholesterol reducing drugs.
5. The Generic Pharmaceutical Program identified in the document produced by You Bates labeled MEI 00151-53, and any similar program, policy, or practice undertaken by You or Kerr.

6. Kerr's communications with customers, manufacturers, suppliers, and competitors concerning the availability of fenofibrate products, including (1) TriCor®, (2) Lofibra®, (3) Antara®, and (4) Triglide®, (5) Lipofen®, and (6) any proposed Impax product either developed or under development, and any analyses of the effect on the price you paid for any fenofibrate product.

7. Kerr's communications or analyses concerning any comparisons between TriCor® and any other version of TriCor®, or any version of Lofibra®, Antara®, Triglide®, Lipofen®, or any proposed Impax product either developed or under development.

8. The nature and amount of impact, injuries, or damages Kerr claims to have resulted from Defendants' alleged anticompetitive conduct, and the identity of all persons involved in or with knowledge thereof.

9. The type and nature of the injunctive relief sought by Kerr.